

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

BRYON PARFFREY

Plaintiff

vs.

PHH MORTGAGE CORPORATION

Defendant

PHH MORTGAGE CORPORATION,

Defendant/Counter-Plaintiff
and Third Party Plaintiff

v.

ANGELINE PARFFREY

Third Party Defendant,

And BRYON PARFFREY,

Plaintiff/Counter-Defendant

United States Courts
Southern District of Texas
FILED

AUG 15 2022

Nathan Ochsner, Clerk of Court

Case No.: 4:21-CV-03151

JURY TRIAL DEMANDED

**PLAINTIFF BRYON PARFFREY'S
DESIGNATION OF EXPERT WITNESSES**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Plaintiff and Counter-Defendant Bryon Parffrey ("Plaintiff") and files this Designation of Expert Witnesses and respectfully shows the Court as follows:

WITNESS

John C. Heath

TOPICS

Attorneys fees, Plaintiff's and Defendant's, the

Attorney at Law
Lexington Law Firm
2875 South Decker Lake Dr.,#200
North Salt Lake, UT 84054
Tel.: (800) 341-8441
E-Mail: john@lexingtonlaw.com

reasonableness and necessity thereof and related matters; various legal matters related to the claims, defenses, affirmative defenses, special denials and other matters related in any way to the pleadings or issues of this lawsuit.

Peter Conlan, CPA
314 Wycliffe Dr.
Houston, Texas 77079
713-252-9721
peter.conlan@pvconlan.com

Various accounting and financial matters related to the claims and defenses and all matters related in any way to the pleadings or issues in this lawsuit.

Any other witnesses designated by Plaintiff or Defendant in Witness Designations, Interrogatories or other pleadings or supplemental pleadings, all incorporated by reference herein.

All topics and categories listed therein and herein

Custodians of any business, financial or other records of any of the above (by deposition on written question, business records affidavit, deposition live testimony or otherwise)

All topics and categories listed therein and herein

NOTE: Plaintiff reserves the right to present any or all of the above witnesses by deposition (including but not limited to video depositions), affidavit, as live witnesses at trial or otherwise, in Plaintiff's discretion. Plaintiff reserves all rights under the Federal Rules of Civil Procedure, Federal Rules of Civil Evidence, case law, orders of the Court and other applicable law to, among other things, supplement the above, call Defendants' witnesses as adverse witnesses or on cross-examination, call undesignated rebuttal witnesses, call fact witnesses for lay opinions, and any and all additional rights related in any way to witnesses.

Dated this 15th day of August, 2022.

Respectfully submitted,



Bryon Parffrey, PRO SE

2610 Tudor Manor

Houston, Texas 77082

Tel.: (281) 782-7966

Fax: (281) 588-5821

E-Mail bryon@buildersacademy.com

PLAINTIFF AND COUNTER-DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on all counsel of record in accordance with the Federal Rules of Civil Procedure on this the 15th day of August, 2022.



Bryon Parffrey, PRO SE